

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

BSH HAUSGERÄTE GMBH,

Civil Action No. 17-CV-5776 (RWS)

Petitioner,

-vs-

JAK KAMHI

Respondent.

**DECLARATION OF NICHOLAS M. BUELL IN SUPPORT OF
PETITIONER'S MOTION FOR THE APPOINTMENT OF A RECEIVER**

NICHOLAS M. BUELL, pursuant to 28 U.S.C. § 1746, hereby declares:

1. I am an attorney with Pillsbury Winthrop Shaw Pittman LLP, a law firm with offices at 1540 Broadway, New York, New York 10036-4039. I am a member in good standing of the Bar of the State of New York, and admitted to practice before this Court. Pillsbury Winthrop Shaw Pittman LLP represents Petitioner BSH Hausgeräte GmbH (“BSH” or “Petitioner”) in the above-captioned action.

2. I submit this declaration in support of BSH’s Motion for the Appointment of a Receiver.

3. On April 3, 2018, this Court issued a Final Judgment in BSH’s favor and against Respondent Jak Kamhi (“Kamhi”) in the following amounts: (1) \$544,230; (2) €1,900,487.13; (3) \$6,270.57; and (4) €10,941.47. *See* ECF No. 66.

4. Kamhi has failed to satisfy any portion of the Final Judgment and has refused to do so. On April 20, 2018, seventeen days after entry of the Final Judgment, I sent a letter to Kamhi’s counsel requesting formal confirmation that Kamhi intended to satisfy the Final Judgment. A true and correct copy of that letter is attached hereto as **Exhibit A**. To date, Kamhi

has not responded to that letter, or otherwise indicated that he intends to satisfy the Final Judgment.

5. Attached hereto as **Exhibit B** is a true and correct copy of the resume of Stuart N. Siegel, of Engel & Völkers.
6. Attached hereto as **Exhibit C** is a true and correct copy of Stuart Siegel's professional biography.
7. Attached hereto as **Exhibit D** is a true and correct copy of the resume of Dolly Hertz, of Engel & Völkers.
8. Attached hereto as **Exhibit E** is a true and correct copy of Ms. Hertz's professional biography.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Dated this 30th day of April, 2018



NICHOLAS M. BUELL